

EXHIBIT “B”

CASTRO LAW

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August 2, 2018

Maher Elsayed
110 Weatherstone Square Drive
Woodstock, GA 30188

Re: Notice of Intent to File Motion to Withdraw the Representation of Daniel Castro, Esq. and Castro Law, P.C. as Legal Counsel in the matter of: *MAHER ELSAYED v. LAKETA PENNINGTON et.al.* United States District Court (NDGA) Civil Action No 1:17-cv-02366

Mr. Elsayed,

You have voluntarily elected to terminate my representation in the above matter.

The request to terminate is accepted, but you have elected not to execute the "Certificate of Consent." I will file an Attorney's Lien in the case for the services that this firm has provided. This correspondence does not in any way alter, amend, or otherwise affect the Attorney's Lien.

Pursuant to the U.S. District Court's Local Rules, I will be filing a Motion to Withdraw in the above-referenced lawsuit. Pursuant to the Local Rule 83.1(E), you are hereby placed on notice of the following information:

- A. Daniel Castro, Esq. and Castro Law, P.C. will be withdrawing from representing Maher Elsayed in the matter of *MAHER ELSAYED v. LAKETA PENNINGTON et.al.* Civil Action No 1:17-cv-02366.
- B. The legal action that Daniel Castro, Esq. and Castro Law, P.C. will be withdrawing from is styled *MAHER ELSAYED v. LAKETA PENNINGTON et.al.* Civil Action No 1:17-cv-02366, The case is pending in the United States District Court for the Northern District of Georgia, Atlanta Division. The Honorable Steve C. Jones, United States District Judge, is presiding over the matter.

The Court's address is:

Richard B. Russell Federal Building
2211 United States Courthouse
75 Ted Turner Drive, SW
Atlanta, GA 30303-3309

The Clerk of Court is James N. Hatten, and the Clerk's Office can be reached at (404) 215-1600.

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Opposing Counsel representing the Defendants are:

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- C. The U.S. District Court for the Northern District of Georgia retains jurisdiction of the case.
- D. You have the burden of keeping the Court informed with respect to where notices, pleadings or other papers may be served. You have an affirmative duty to notify the Clerk's Office, in writing, of any change in address and/or telephone number. Note that the Court may find that a failure to keep the Clerk's Office so informed and which causes delays or otherwise adversely affects the management of a civil case constitutes grounds for dismissal without prejudice or entry of a default judgment against you.
- E. You have the obligation to prepare for trial or hire other counsel to prepare for trial.

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- F. Refusal to meet the burdens of preparing for trial or complying with Court deadlines may result in adverse consequences.
- G. The dates of any scheduled proceedings, including trial, and that holding of such proceedings will not be affected by the withdrawal of counsel. At this time discovery has been completed and a partial motion for summary judgment is pending. After the Court rules upon the pending motion then a pre-trial order will need to be prepared. The pre-trial order will likely be due 30 days after the Order deciding the motion for summary judgment.
- H. The service of this notice is made at your last known address:

Maher Elsayed
110 Weatherstone Square Drive
Woodstock, GA 30188
- I. You have the right to file an objection within fourteen (14) days of the date of this notice if you do not consent to the withdraw of representation.

Upon the filing of the Motion to Withdrawal, I will be informing the Court that the service of notices, pleadings, or other papers may be served on you at your above address. ***But it is your responsibility to keep the Court informed of your current contact information to ensure that any attempt of service reaches you, prepare the case for trial, and comply with all Court mandated deadlines.***

Sincerely,



Daniel Castro, Esq.
Castro Law, P.C.